

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STREAMLINED CONSULTANTS, INC. d/b/a
STREAMLINED CONSULTANTS; AND MOSHE
SCHOENWALD,

Case No. 7:21-cv-9528-KMK

Plaintiffs,

- against -

EBF HOLDINGS, LLC d/b/a EVEREST BUSINESS
FUNDING d/b/a EBF,

Defendant.

**EBF HOLDINGS, LLC'S NOTICE OF MOTION
FOR SANCTIONS PURSUANT TO FED. R. CIV. P. 11**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law;
Declaration of David A. Picon in Support of EBF Holdings, LLC's Motion for Sanctions
Pursuant to Fed. R. Civ. P. 11, and the exhibits thereto; and the Declaration of Alexandra Reyes
in Support of EBF Holdings, LLC's Motion for Sanctions Pursuant to Fed. R. Civ. P. 11, and the
exhibits thereto; Defendant EBF Holdings, LLC ("Everest"), by and through its undersigned
attorneys, will and do hereby move this Court, before the Honorable Kenneth M. Karas, at the
United States District Court for the Southern District of New York, 300 Quarropas St., White
Plains, New York, at a date and time set by the Court, for an order imposing sanctions on
Plaintiffs Streamlined Consultants, Inc., and Moshe Schoenwald, and Plaintiffs' counsel pursuant
to Rule 11 of the Federal Rules of Civil Procedure. Everest respectfully requests an opportunity
to be heard at oral argument, on a date and at a time designated by the Court.

Dated: New York, New York
December 21, 2022

Respectfully submitted,

/s/ David A. Picon

David A. Picon

Matthew J. Morris

William G. Fassuliotis

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